

2024-CP-10-05667. On December 11, 2024, MUSC was served with the Amended Summons and Amended Complaint.¹ A copy of the Amended Summons and Amended Complaint are attached hereto as Exhibit “A.”

II.

The action referred to in Paragraph I is a civil action over which this Court has original and removal jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1441 (a) and (c). Specifically, Plaintiff’s Amended Complaint alleges discrimination by MUSC in violation of the Americans with Disabilities Act, the Age Discrimination in Employment Act, and violation of Section 503 of the Rehabilitation Act.

III.

This Notice of Removal has been filed within thirty (30) days after the earliest date of service of the Amended Summons and Amended Complaint, and the time for filing this Notice of Removal pursuant to 28 U.S.C. § 1446(b) has not expired.

IV.

Written notice of the filing of this Notice of Removal will be promptly served on counsel for the Plaintiff.

V.

A true and correct copy of this Notice of Removal will be filed with the Clerk of Court of Common Pleas for the Ninth Judicial Circuit, State of South Carolina, as provided under 28 U.S.C. § 1446(d).

WHEREFORE, MUSC removes this action to this Court’s jurisdiction.

¹ Plaintiff did not serve the original Summons and Complaint on MUSC.

s/ Bob J. Conley

Bob J. Conley (FID #6791)

CLEVELAND & CONLEY, LLC

171 Church Street, Suite 310

Charleston, South Carolina 29401

Telephone: (843)577-9626

bconley@clevelandlaborlaw.com

ATTORNEY FOR DEFENDANT

December 31, 2024

Charleston, South Carolina

CERTIFICATE OF SERVICE

This is to certify that I have this date caused to be served a copy of Defendant Medical University of South Carolina (MUSC) d/b/a Medical University Hospital Authority's Notice of Removal on counsel for Plaintiff by email and depositing same in the United States Mail, First Class postage prepaid, and addressed to:

Bonnie Travaglio Hunt
Hunt Law, LLC
P.O. Box 1845
Goose Creek, South Carolina 29445
Telephone: (843) 553-8709
bthunt@huntlawllc.com

s/ Bob J. Conley
Bob J. Conley (FID #6791)
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, South Carolina 29401
Telephone: (843) 577-9626
Facsimile: (843) 577-6672
bconley@clevelandlaborlaw.com

ATTORNEY FOR DEFENDANT

December 31, 2024
Charleston, South Carolina